

EXHIBIT E

From: Herring, Angela K. <AKHerring@wlrk.com>
Sent: Tuesday, August 6, 2019 6:55 PM
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Subject: RE: In re FOMB as representative of PREPA, No. 17-bk-4780-LTS (D.P.R.)

Ashley,

Your July 16 email identified Mr. Batlle as a 30(b)(6) witness on only a narrow set of topics, rather than all elements of our Topic 4. If your email today was intended to identify Mr. Batlle as a 30(b)(6) witness on the

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entirety of Topic 4, then we appreciate the further designation. If that was not what you meant in your email, then we'd appreciate receiving 30(b)(6) designations from PREPA and AAFAF in response to Topic 4 as well as the topics on which they had previously designated Mr. Sobrino.

We expect we'll be willing to defer any deposition of Mr. Roque Torres (subject to your reservation of rights to object to any such deposition) until after the deposition(s) of your 30(b)(6) witness(es), as you've suggested. But in light of the forthcoming supplemental productions, we'd suggest it would be more efficient to discuss the path forward on depositions after we have more information from you on the scope of those productions – including with respect to custodians, search terms, and PREPA's preservation of documents (per my email of 8/1 at 11:44am EDT).

We continue to reserve all rights, including with regard to the schedule.

Regards,
Angie

Angela K. Herring

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From: Pavel, Ashley <apavel@omm.com>

Sent: Tuesday, August 6, 2019 2:31 PM

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Subject: RE: In re FOMB as representative of PREPA, No. 17-bk-4780-LTS (D.P.R.)

*** EXTERNAL EMAIL ***

Counsel-

The attached deposition notice to Mr. Roque Torres is untimely under the scheduling order [ECF 1366], which required deposition notices to be served on July 5, 2019, and the untimely notice is not excused by any of the issues you flagged in your email. To the extent AAFAF and PREPA offer a fact witness to replace Mr. Sobrino, the Fuel Line Lenders will have the opportunity to depose that witness. AAFAF and PREPA have not designated Mr. Roque Torres to fill that role. As stated in my July 16, 2019 12:31 pm correspondence in the attached exchange, we agreed to designate Fernando Batlle to provide factual testimony in response to topic 4. Accordingly, we intend to move to quash the subpoena to Mr. Torres as untimely and cumulative of the 30(b)(6) notice. However, we are willing to meet and confer with you to resolve the issue without motion practice, if possible, including by coming to an agreement along the lines of what we have in place for Mr. Morales.

Please let us know when you are available to discuss.

Best,
Ashley

From: Herring, Angela K. <AKHerring@wlrk.com>

Sent: Sunday, August 4, 2019 5:19 PM

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Subject: In re FOMB as representative of PREPA, No. 17-bk-4780-LTS (D.P.R.)

Counsel:

Please see the attached amended expert disclosure and notice of deposition on behalf of Cortland and Solus. We are serving this notice of deposition in light of the withdrawal of Mr. Sobrino's testimony and the lack of clarity on PREPA's plans for a 30(b)(6) witness, including with respect to Topic 4 in our deposition notice. Please note that the date in the notice is based on the existing schedule, but if the schedule is extended as contemplated, we will want to depose Mr. Roque after the supplemental productions ordered by the Court are complete. We also note that Solus's notice of deposition of Nelson Morales remains outstanding, and, subject to the agreements memorialized in Dkt. No. 1306, the Fuel Line Lenders remain interested in his deposition if PREPA's 30(b)(6) deposition is inadequate. We are available to meet and confer to discuss these deposition notices and to identify the most efficient way for the Fuel Line Lenders to obtain the requested deposition testimony.

Regards,

Angela K. Herring

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Thank you in advance for your cooperation and assistance.
